

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**BASILIO TOVAR, and  
RUBI ESPARZA,**

*Plaintiffs,*

**v.**

**JOSUE RODRIGUEZ,**

*Defendant.*

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**CIVIL ACTION NO. 3:23-cv-1758**

**JOINT STATEMENT PROPOSING A DISCOVERY SCHEDULE**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE:**

Plaintiffs, Basilio Tovar and Rubi Esparza, and Defendant Josue Rodriguez (collectively, “the Parties”), pursuant to this Court’s Order (ECF 22), submit this Joint Statement Proposing A Discovery Schedule.

On February 23, 2024, Plaintiffs filed their Unopposed Motion for Leave of Court to Conduct Limited Discovery on Qualified Immunity. (ECF 20). On February 26, 2024, this Court issued an Order granting that motion and directing the parties to file a joint statement proposing a discovery schedule no later than March 8, 2024. (ECF 22). Accordingly, the Parties submit this Joint Statement Proposing A Discovery Schedule.

**PROPOSED DISCOVERY SCHEDULE**

The Parties propose the following discovery schedule:

- Plaintiffs’ approved discovery requests to Defendant by February 29, 2024.
- Defendant’s responses by April 1, 2024.
- Plaintiffs’ deadline to file motion with the Court to request additional discovery based off Defendant’s responses by April 30, 2024.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully ask the Court to issue an order incorporating the above dates into a Discovery Order in this case, and for such other and further relief to which they may be entitled, general or special, at law or in equity.

/s/ James P. Roberts

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**ATTORNEY FOR DEFENDANT**

**CERTIFICATE OF CONFERENCE**

I certify that on February 26, 2024, Plaintiff's counsel James P. Roberts reached out to Defendant's counsel Lindsay Wilson Gowin regarding this joint statement and the Parties agree.

/s/ James P. Roberts  
JAMES P. ROBERTS

**CERTIFICATE OF SERVICE**

I certify that on February 27, 2024, a copy of this motion was served on all parties of record via the Court's CM/ECF filing system.

/s/ James P. Roberts  
JAMES P. ROBERTS